

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

WILLIAM AMES, JR., et al.,

Plaintiffs,

v.

ST. FRANCOIS COUNTY SHERIFF'S

DEPARTMENT, et al.,

Defendants.

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Cause No. 4:19-CV-00173 SCR

CONSENT MOTION FOR PROTECTIVE ORDER

By consent, the Plaintiffs and Defendants move for a protective order, stating:

1. The discovery in this matter concerns potentially sensitive documentation produced by all parties.
2. Further, Defendant St. Francois County seeks to protect sensitive documentation, and also to prevent and protect itself from inadvertent disclosure of privileged material as contemplated by Federal Rule of Evidence 502(b).
3. Counsel for all parties to this action, after having conferred, stipulate and agree that a proposed protective order in the form affixed hereto should govern the use and handling of confidential material for the duration of this case.
4. The undersigned now move for the entry of this protective order by consent to further the interest of justice and not for any improper purpose.

WHEREFORE the undersigned move for the entry of the proposed consent protective order affixed hereto, along with all such other and further relief deemed just and proper.

Respectfully submitted,

/s/ Michelle V. Stallings

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Certificate of Service

I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 24th day of April, 2020 to be served by operation of the Court's electronic filing system upon all parties through their counsel registered with CM/ECF.

/s/ Michelle V. Stallings